



March 19, 2003

Mr. Richard H. Karney, Manager
Energy Star Program
Department of Energy
Washington, DC 20685

Dear Mr. Karney:

In response to your letter dated February 11, 2003, presenting the two Energy Star alternatives, Hurd Millwork Company, Inc. recommends the adoption of the Three Zone Alternative as the revised Energy Star criteria. After review of the two alternatives, this recommendation is based upon the following.

1. The Three Zone Alternative offers energy savings over the existing criteria and will significantly reduce peak cooling and overall cooling energy requirements in the north/central zone versus the Four Zone Alternative. The reductions in peak and overall cooling energy costs also translate into a reduction in air pollution.
2. The conclusion that the Four Zone Alternative will result in greater overall energy savings due to higher solar heat gain in the north/central zone during heating seasons may be unrealistic. Homes must be designed and oriented properly to take full advantage of passive solar heating. Since the majority of homes are not specifically designed and oriented for passive solar heating, the heating savings in the north/central zone is likely over estimated.
3. The commercial availability, cost and improved performance of sputtered low-e products, with the lower (≤ 0.40) SHGC and improved emissivity, has resulted in their preferential use by most window manufacturers as their standard low-e offering. In fact, it can be used to meet the proposed Energy Star criteria in all three or four zones with proper frame and sash construction. If the Four Zone Alternative with the ≤ 0.55 SHGC were adopted, most window manufacturers will continue to offer their standard sputter coated low-e in the north/central Energy Star zone, as they do now. Therefore, in actuality, the energy savings will more closely resemble the Three Zone Alternative.

Mr. Richard H. Karney
Energy Star Program
March 21, 2003
Page Two

4. The Four Zone Alternative will add more confusion and complexity to the program without adding any significant advantage.

I would ask that the DOE adopt the Three Zone Alternative as soon as possible and move forward with the program

Sincerely,

Stephen J. Suchomel
President

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